

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE	§	
KINGREY, and SANDRA McCOLLUM,	§	
individually and as heirs at law to the Estate	§	
of LARRY GENE McCOLLUM,	§	
PLAINTIFFS	§	
	§	
v.	§	CIVIL ACTION NO.
	§	3:12-cv-02037
	§	
BRAD LIVINGSTON, JEFF PRINGLE,	§	
and the TEXAS DEPARTMENT OF	§	
CRIMINAL JUSTICE.	§	
DEFENDANTS	§	

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME**

Plaintiffs respectfully ask the Court to extend the deadline to respond to Defendant Livingston's Motion for Judgment on the Pleadings (Doc. 19) filed on February 1, 2013.

Pursuant to Local Rule CV-7.1(e), Plaintiff's response to the Motion to Dismiss is due February 22, 2013. Plaintiffs requests the response deadline be extended to April 8, 2013. This request is made to allow Plaintiffs to complete discovery on a schedule mutually agreed to by the parties.

Pursuant to this Court's order of February 5, 2013, this case is not set for trial until February 2014. The deadline for dispositive motions is not until September 16, 2013. Granting this motion will not delay any proceedings.

The request is made for good cause, not to cause delay.

Dated: February 21, 2013

Respectfully submitted,

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By /s/ Scott Medlock  
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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Northern District of Texas.

**CERTIFICATE OF CONFERENCE**

By my signature above, I certify I conferred with counsel for the Defendants, Bruce Garcia, and he is unopposed to this motion.